

1992



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

NOV 24 1992

REPLY TO THE ATTENTION OF:

5WD-17J

William Child, Chief  
Bureau of Land  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, Illinois 62794-9276

Dear Mr. Child:

On October 26-28, 1992, representatives of the Underground Injection Control (UIC) Section met with your UIC program staff to conduct the Fiscal Year (FY) 1992 End-of-Year evaluation of your Agency's UIC program. During this review the Region focused on those actions which have occurred since the FY 1991 End-of-Year Review.

In addition, the reversion of Illinois' 1422 UIC program to Federal authority was discussed, as well as the ideas our staffs have raised to maximize cooperation and minimize the duplication between our two agencies. Of primary concern to the Region at this time is the establishment of, and adherence to, a schedule for the reversion process. As this plan is a necessary part of the reversion process under 40 CFR 145.34, we encourage the Illinois Environmental Protection Agency (IEPA) to place a high priority on this activity.

In general, the Region is pleased with the work IEPA has accomplished during FY 1992, therefore, the issues identified here reflect areas that need to be addressed to ensure a smooth continuation of the UIC program in Illinois. We compliment the staff on the work they have done to assist Region 5 in assuming authority for the program, and for the effort they have made to avoid duplication of effort. Region 5 is committed to working with the State and we appreciate the cooperation we have received from the State in this effort.

Enclosed is a copy of the FY 1992 Final Report which documents the major findings of the oversight team. Under separate cover, a copy of the FY 1992 Executive Summary is being sent to the

Director of IEPA. The Executive Summary contains brief highlights of the findings documented in the enclosed report. If you have any questions or comments regarding this evaluation, or the transfer of authority, please contact Laura Flynn, of my staff, at (312) 886-2929.

Sincerely,

A handwritten signature in cursive script that reads "Edward P. Watters".

Edward P. Watters, Chief  
Safe Drinking Water Branch

enclosure

bcc: Ken Westlake, R-19J  
Edward Watters  
Richard Zdanowicz  
John Taylor  
George Hudak  
Laura Flynn  
Rebecca Harvey  
David Werbach  
Lisa Perenchio  
Raymond Urchel  
Jerri Garl/Rita Bair, GW-16J

Mary Gade, Director  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, Illinois 62794-9276

Dear Ms. Gade:

On October 26-28, 1992, representatives of the Underground Injection Control (UIC) Section met with your UIC program staff to conduct the Fiscal Year (FY) 1992 End-of-Year evaluation of your Agency's UIC program. During this review, the Region focused on those actions which have occurred since the FY 1991 End-of-Year Review.

In addition, the reversion of Illinois' 1422 UIC program to Federal authority was discussed, as well as the ideas our staffs have raised to maximize cooperation and minimize the duplication between our two agencies. Of primary concern to the Region at this time is the establishment of, and adherence to, a schedule for the reversion process. As this plan is a necessary part of the reversion process under 40 CFR 145.34, we encourage IEPA to place a high priority on this activity.

In general, the Region is pleased with the work IEPA has accomplished during FY 1992. The issues identified here reflect areas that need to be addressed to ensure a smooth continuation of the UIC program in Illinois. We compliment the staff on the work they have done to assist Region 5 in assuming authority for the program, and for the effort they have made to avoid duplication of effort. Region 5 is committed to working with the State and we appreciate the high level of cooperation we have received from the State in this effort.

Enclosed is a copy of the Executive Summary which highlights the major findings of the oversight team. Under separate cover, a copy of the FY 1992 Final Report is being sent to the Chief of the Bureau of Land. The Final Report contains a much more detailed documentation of the team's findings. If you have any questions or comments regarding this evaluation, or the transfer

of authority, please contact me, or have your staff contact Laura Flynn at (312) 886-2929.

Sincerely yours,

Valdas V. Adamkus  
Regional Administrator

Enclosure

cc: William Child, IEPA  
William Radlinski, IEPA

of authority, please contact Laura Flynn, of my staff, at (312) 886-2929. *do not separate*

Sincerely yours,

Valdas V. Adamkus  
Regional Administrator

Enclosure

cc: William Child, IEPA  
William Radlinski, IEPA

bcc: Edward Watters  
Richard Zdanowicz  
John Taylor  
Laura Flynn  
George Hudak  
Rebecca Harvey  
David Werbach  
Lisa Perenchio  
Raymond Urchel  
Jerri Garl/Rita Bair (GW-16J)

*[Signature]* 11/09/92.

*W\** 10/29/92

*[Signature]* 10/29/92

TS 10/29/92

*[Signature]* 10/29

*[Signature]* 10/29/92

8/10/30

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aw  
11/9/92

*[Signature]* 11/2

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
FISCAL YEAR (FY) 1992  
FINAL REPORT

The primary focus of the Fiscal Year (FY) 1992 End-of-Year evaluation was on the steps necessary to ensure the smooth transition of the 1422 Underground Injection Control (UIC) program from State to Federal authority. We are pleased with the cooperation we have received from your staff in this effort.

Current plans call for IEPA to continue implementing the UIC program until such time that the program officially reverts to the USEPA. Following the transfer of authority, IEPA intends to continue implementing a state-run Class I program which parallels the Federal program.

Concerns have been raised by both our Agencies, as well as by representatives from industry, about possible duplication of effort during, and after, the reversion. Our staffs are currently working together to ensure that permits issued by Region 5 are consistent with IEPA's permits. We are also working with your staff to develop a schedule for joint inspections.

On November 9, 1992, members of your staff will be coming to Chicago to participate in a Total Quality Management (TQM) session designed to 1) document the various UIC processes employed by our respective staffs, 2) identify areas of overlap and 3) explore opportunities for joint activities. Our staffs will also make recommendations on the role each Agency should play after the reversion.

This will be followed up by a meeting on November 18, 1992, between the IEPA Bureau of Land Chief and the Region 5 Underground Injection Control Chief to resolve any remaining issues and forge an agreement between our two programs regarding the continuation of the UIC program. We are also considering plans to host a joint Region 5/IEPA meeting for industry representatives to explain how the UIC program will be run in Illinois, and answer any questions they may have regarding the reversion.

One area of concern, however, involves the establishment of a schedule for the reversion process, as required under 40 CFR 145.34. Although Region 5 received formal notification of your Agency's intent to return primacy for the UIC program on August 10, 1992, to date we have not received a plan for the reversion. During this review your staff committed to submitting a plan

in the near future and we encourage you to adhere to this commitment.

With regard to activities undertaken during FY 1992, we are pleased with the Class I permitting program and, in general, are also pleased with the Class I Compliance and Enforcement programs. However, the Region remains concerned about the follow-up on Cabot's Well #1, and will continue to work closely with IEPA to resolve these issues.

We are also pleased that IEPA has conducted follow-up activities at 15 high priority shallow injection well (Class V) sites. These activities play a significant role in laying the ground work for a viable Class V program in Illinois. As warranted, the Region will pursue additional follow-up actions to ensure compliance with applicable regulations. Although IEPA has chosen to no longer implement a Class V program, when the Region conducts Class V inspections or enforcement activities, IEPA is welcomed to participate. The Region also requests a copy of IEPA's Class V inventory for use during and after the reversion.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

**JUL 15 1992**

R-19

Ms. Mary Gade  
Director  
Illinois Environmental Protection Agency  
2200 Churchill Road  
P.O. Box 19296  
Springfield, Illinois 62794-9276

Dear Ms. Gade:

On April 29-30, 1992, the mid-year file review of the Illinois Environmental Protection Agency's (IEPA) Underground Injection Control (UIC) program was conducted by Region 5. On May 12, 1992, the close-out was held to discuss the Region's findings. The purpose of the evaluation was to conduct the routine mid-year review of the progress made in the regulation of Class I, III, IV and V wells since the Fiscal Year (FY) 1991 end-of-year (EOY) review.

In addition, the future of IEPA's UIC program was discussed. I understand that current plans call for IEPA to complete all activities committed to in the FY 1992 workplan, however, IEPA does not intend to continue with the Class V program after October 1, 1992. Although the State would like to retain primacy for the Class I, III and IV portions of the program, we believe that a partial delegation of the Section 1422 UIC program is not permissible.

My staff has recently organized a workgroup comprised of UIC management and senior staff, as well as a representative from Region 5's Office of Regional Counsel (ORC), to explore various options for Illinois' UIC program. In order for the Region to proceed, I ask that the State notify the United States Environmental Protection Agency (USEPA) in writing of its intentions as soon as possible. On May 22, 1992 we requested notification of the State's intentions by June 15, 1992, and to date have not received it. We are committed to working with the State to seek resolution in this matter, however, in order to ensure a smooth continuation of the UIC program, we need to proceed as expeditiously as possible.

With regard to the mid-year evaluation, we remain pleased with the Class I permitting program and with the high level of cooperation received in this area and, in general, are pleased with the Class I compliance and enforcement program. However, while the mechanisms are in place for a very good compliance monitoring program, we are concerned about the timeliness of reviewing monthly monitoring reports. We believe that the current process of reviewing these documents every 3 or 6 months, could result in potentially dangerous situations going unaddressed for extended periods of time.

The Region is also concerned about IEPA's failure to submit quarterly reporting forms (EPA form 7520). To date, the Region has not received quarterly reports for the first or second quarters, even though the FY 1992 workplan clearly states "[q]uarterly reports will be submitted to USEPA no later than the tenth working day of January, April, July and October" (emphasis added). We request that the State submit the first and second quarter report immediately, and submit all future reports in accordance with the approved schedule.

With regard to the Class V program, during FY 1992, 0.5 workyears have been devoted to Class V activities, a reduction from 0.86 workyears in FY 1991. We remain concerned that adequate resources are not being directed toward Class V activities, and also that those activities committed to in the FY 1992 workplan may not be completed before October 1, 1992.

Since the FY 1991 EOY evaluation, apparently the only Class V activity conducted by IEPA has been the response to inquiries regarding current requirements. While we recognize the benefits of informing current and potential operators of current requirements, as well as other programs with potential authority, the effort falls far short of comprising an adequate Class V program.

In addition, during FY 1991, IEPA completed a Class V video, inspections of 104 high priority facilities, and also initiated discussions with the Illinois Department of Health and the IEPA Division of Water Pollution Control regarding Class V overlap. These activities played a significant role in laying the ground work for a viable Class V program.

IEPA committed to following-up on these activities in the FY 1992 grant application and workplan, and we are disappointed that no follow-up to these activities appears to be taking place. While we recognize the possibility that Illinois may not retain authority for the 1422 program after FY 1992, it is essential that the State continue to meet its obligations until authority for the program officially transfers to USEPA.

A copy of the FY 1992 mid-year evaluation report is enclosed. If you have any questions or comments regarding this evaluation, please contact Laura Flynn, of my staff, at (312) 886-2929.

Sincerely yours,

Valdas V. Adamkus  
Regional Administrator

Enclosure

cc: William Child, IEPA  
William Radlinski, IEPA

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
UNDERGROUND INJECTION CONTROL (UIC) PROGRAM  
FISCAL YEAR (FY) 1992  
MID-YEAR EVALUATION

INTRODUCTION

The Illinois Environmental Protection Agency (IEPA) received primacy on February 1, 1984, to administer the State's Underground Injection Control (UIC) program for Class I, III, IV, and V wells. IEPA regulates a universe of six active Class I wells, and approximately 1,900 shallow injection wells (Class V wells) identified to date. There have been no Class III wells identified in the State and there are no known Class IV wells. Regulation of injection wells is the responsibility of IEPA's Bureau of Land, formerly known as the Division of Land Pollution Control.

The participants in the FY 1992 mid-year evaluation included:

Participants

Region 5: John Taylor  
George Hudak  
Ray Urchel

Laura Flynn  
Dave Werbach  
Rebecca Harvey

IEPA: Bill Child  
Ron Steward  
Glenn Savage

Bill Radlinski  
Jill Withers  
Scott Phillips  
Ed Bakowski

## PROGRAM ASSESSMENT

### Program Administration

During Fiscal Year (FY) 1992, 1.72 workyears were committed to the implementation of the 1422 program in Illinois for a total budget of \$112,133. The United States Environmental Protection Agency (USEPA) continues to support IEPA's UIC program with 75% funding.

IEPA's FY 1992 grant was not awarded until May 22, 1992, due to the untimely submission of IEPA's grant application and workplan. An approvable workplan was not received by the Region until February 6, 1992. Also, the Final Financial Status Report, due to the Region by December 31, 1991, and required before the FY 1992 grant could be issued, was not received until April 2, 1992. If IEPA decides to continue with the 1422 program, the Region must receive an approvable grant application for FY 1993 funds no later than September 30, 1992, preferably by mid-August to allow for review and negotiation.

The Region is also concerned about IEPA's failure to submit quarterly reporting forms (EPA form 7520). To date, the Region has not received quarterly reports for the first or second quarters, even though the FY 1992 workplan clearly states "[q]uarterly reports will be submitted to USEPA no later than the tenth working day of January, April, July and October" (emphasis added).

Submittal is required not only under the approved annual workplan, but information on enforcement actions is also required under Illinois' approved 1422 UIC Primacy Package. The Region requests that the State submit the first and second quarter reports immediately, and submit the reports for future quarters in accordance with approved schedules. While we recognize the possibility that Illinois may not retain authority for the 1422 program after FY 1992, it is essential that the State continue to meet its obligations until authority for the program officially transfers to USEPA.

### Recommendations and Conclusions

1. If IEPA intends to apply for FY 1993 grant dollars, an approvable grant application must be received by the Region no later than September 30, 1992, preferably by mid-August to allow for review and negotiation.
2. The Region requests immediate submittal of second quarter reports (forms 7520), and submittal of future reports in accordance with approved schedules.

### Class I Permitting

We remain pleased with the work done in Class I permitting, and with the high level of cooperation received from IEPA in this area. IEPA currently regulates a universe of six active Class I facilities in Illinois. Permit determinations have been made for all Class I wells in Illinois, although one of these facilities, the Velsicol #2 well, is currently under authorization by rule.

Two Class I non-hazardous permits were recently terminated by IEPA. Natural Gas Pipeline (NGPL)-Herscher and (NGPL)-St. Elmo, received Class II permits from the Illinois Department of Mines and Minerals (IDMM). A joint inspection of these facilities was conducted by IDMM and IEPA, and the injectate at each well was sampled using the Toxicity Characteristic Leaching Procedure. After reviewing the available data, the Agencies determined that the wells were no longer receiving Class I wastes, and could be issued Class II permits.

During the FY 1992 mid-year evaluation, Region 5 reviewers examined two Class I injection well files, the Allied-Signal and LTV Steel files. These reviews are discussed below.

#### Allied-Signal

Allied has requested that several additional waste codes be included in their land ban exemption. This will require a modification to their petition. Allied has made the necessary technical adjustments to the land ban model and the USEPA is ready to issue the public notice of draft approval. However, a potential problem has been brought to light after examination of Allied's monthly chemical analysis reports. It appears that Allied may have been illegally disposing of banned wastes. The USEPA will seek a determination from Region 5's Division of Waste on this situation, and will delay issuing the petition exemption modification until a determination is made. At that time, either the petition modification will be approved and issued, or an enforcement action will need to be taken.

The new permit for Allied is now in draft, and certain modifications, necessitated by the land ban modification, have been included at the request of the USEPA. We will inform the State of any other modifications needed after review of the draft permit. The Region requests that IEPA provide us with a copy of the draft permit as soon as it is available.

#### LTV Steel

The new permit for LTV Steel Co. was issued recently and included provisions for the ground water monitoring well required under LTV's land ban petition. Under the conditions of the permit, the

well is to be operational by October 29, 1992. We will need to work closely with IEPA and with LTV while the well is being drilled and constructed to ensure that it operates properly, and we are able to obtain meaningful sampling results.

### Recommendations and Conclusions

1. The Region remains pleased with the work done in Class I permitting, and with the high level of cooperation received from IEPA in this area.
2. Allied has made the necessary technical adjustments to Allied's land ban model and the Region is ready to issue the public notice of draft approval. However, Allied may have been illegally disposing of banned wastes. The Region is seeking a determination from Region 5's Department of Waste, and will delay issuing the petition exemption modification until a determination is made. The Region requests that IEPA provide us with a copy of the draft permit as soon as it is available.
3. The new permit for LTV Steel Co. was issued recently and included provisions for the ground water monitoring well. We will continue to work with IEPA and LTV in ensuring proper construction and operation of the well.

### Class I Compliance Monitoring and Enforcement Actions

IEPA recently developed a new system for reviewing monthly monitoring reports which includes a review by field inspectors, as well as by the permit writers. If properly implemented, the new procedures offer a fairly comprehensive review of these reports. However, we remain concerned about the timeliness of the reviews. This issue is discussed in detail below.

#### Compliance Monitoring

Region 5 contacted several field inspectors prior to the last evaluation to discuss implementation of the new review procedures. During these discussions, Region 5 found that the reports were being reviewed by the field inspectors. However, rather than reviewing each report monthly, most inspectors only reviewed the reports immediately before the quarterly or annual inspection.

During the FY 1991 EOY evaluation, IEPA management agreed to notify each field office regarding the proper procedures for reviewing monthly compliance reports. However, prior to this evaluation, Region 5 again contacted several field inspectors and

found that the reports were still not being reviewed monthly, but rather, were still only being reviewed prior to the quarterly inspections. This issue also resurfaced during the discussions regarding Cabot which are described below.

IEPA officials stated at the close-out that operators are required to indicate instances of noncompliance in the cover letter that accompanies each monthly compliance report. They felt that this was a sufficient precaution against prolonged noncompliance. They also stated that they believed we had agreed during the FY 1991 EOY evaluation to quarterly reviews of these reports.

We reiterate that the Region considers it essential that each field inspector review the monthly monitoring reports for the facilities in their region on a monthly basis. This will allow IEPA to identify, prepare and execute enforcement actions in a timely manner. We believe that a review of these documents every 3 or 6 months, or longer, could result in potentially dangerous situations going unaddressed for extended periods of time, regardless of whether or not they are mentioned in the cover letter. We encourage the Bureau of Land management to work with the field staff to ensure that all review procedures are implemented on a monthly basis.

#### Cabot Corporation

Cabot's Well #1 lost 154 gallons of annular fluid between April 1991 and June 1991. The State, however, was not notified of the significant leak until the well's alarm sounded in June 1991. The Region believes that Cabot, under the terms of its Class I permit, should have notified IEPA as soon as the Company became aware of the leak.

In addition, during an FY 1991 inspection, IEPA staff identified 36 permit violations at Cabot's deepwell injection facility. The violations included operating, maintenance, and reporting violations. During FY 1991, the State issued two Compliance Inquiry Letters (CILs) to Cabot, which resulted in ongoing negotiations between Cabot and IEPA. During the FY 1991 EOY evaluation, Region 5 was informed that the Cabot case would be forwarded in late December to the Enforcement Decision Group (EDG), a pre-screening process for possible litigation.

During this review, we found that the EDG had referred the Cabot case back to the case team with permission to pursue enforcement action. The IEPA attorney assigned to the case is still reviewing the facts to determine if sufficient evidence exists to support further enforcement actions. No further information was available during the review, however, the Region will continue to monitor this situation in the future, and will consider a primacy



enforcement action if the State is unwilling or unable to proceed.

In a related matter, Cabot has proposed drilling a new Class I well, possibly to replace Well #1. Region 5 officials will continue to work with IEPA staff as the proposal develops.

#### Administrative Order Authority

Since the FY 1991 EOY evaluation there has been no progress on IEPA's attempt to obtain Administrative Order (AO) authority. The Region fully supports IEPA's efforts to obtain AO authority, and we strongly encourage IEPA to continue pursuance. In the absence of such authority, we encourage IEPA to refer cases of serious, and/or repeated offenders to the State's Attorney General for action. In addition, Region 5 welcomes referrals for primacy enforcement action.

#### Compliance and Enforcement Strategies

Prior to the FY 1991 EOY evaluation, Region 5 provided comments on IEPA's Compliance Management/Enforcement System (CMES), a Resource Conservation and Recovery Act (RCRA) oriented strategy. In general, we feel the CMES will serve as an excellent basis for the UIC compliance strategy. However, if IEPA intends to continue with primacy for the UIC program, the document will need to be tailored to reflect the specifics of the UIC program.

Simply stating that "the system we use in RCRA is the same system we use in UIC," does not constitute an adequate UIC compliance strategy. Pending continuance of the UIC program, IEPA should revise the CMES so that it describes, in detail, the procedures the UIC staff use in all aspects of their compliance/enforcement program.

Contingent upon IEPA's continuing with the UIC program, the State will need to identify short-term enforcement priorities for the upcoming year. Bureau of Land management indicated that they intend to continue with follow-up on the high priority Class V sites identified during FY 1991, and also continue with compliance monitoring of Class I sites. However, this needs to be documented in enforcement strategies for FY 1992 and FY 1993.

#### Recommendations and Conclusions

1. In general, the Region is pleased with the new system developed by the State for reviewing monthly monitoring reports. However, we remain concerned about the timeliness of the review procedure.

2. It is essential that field inspectors review the monitoring reports for each facility on a monthly basis. Delaying review of these reports could result in potentially dangerous situations going unaddressed for extended periods of time.
3. The EDG has given permission to the Cabot case team to pursue enforcement actions. The Region will continue to work with IEPA as the proposal develops, and will consider a primacy enforcement action if the State is unwilling or unable to proceed.
4. The Region continues to support IEPA's efforts to obtain AO authority. In the absence of such authority, we encourage referrals to the State Attorney General and/or Region 5.
5. Contingent upon IEPA's continuing with the UIC program, the State will need to identify short-term enforcement priorities for the upcoming year, and also update the CMES to reflect the specifics of the UIC program.

#### Class V Program

During FY 1992, 0.5 workyears have been devoted to Class V activities, a reduction from 0.86 workyears in FY 1991. We remain concerned that adequate resources are not being directed toward Class V activities, and also that those activities committed to in the FY 1992 workplan may not be completed before October 1, 1992.

Since the FY 1991 EOY evaluation, apparently the only Class V activity conducted by IEPA has been the response to inquiries regarding current requirements. While we recognize the benefits of informing current and potential operators of current requirements, as well as other programs with potential authority, the effort falls far short of comprising an adequate Class V program.

In addition, during FY 1991, IEPA completed a Class V video, inspections of 104 high priority facilities, and also initiated discussions with the Illinois Department of Health and the IEPA Division of Water Pollution Control regarding Class V overlap. These activities played a significant role in laying the ground work for a viable Class V program.

IEPA committed to following-up on these activities in the FY 1992 grant application and workplan, and we are disappointed that no follow-up to these activities appears to be taking place. While we recognize the possibility that Illinois may not retain authority for the 1422 program after FY 1992, it is essential

that the State continue to meet its obligations until authority for the program officially transfers to USEPA. Specific discussions and suggestions related to these activities are listed below.

#### Follow-up Investigations of High Priority Wells

During FY 1991, IEPA conducted 104 inspections of potential "high priority" (industrial and service station bay) Class V sites. Of those 104 facilities, 17 were found to either definitely have a shallow injection well, or were identified as needing further assessment before a determination could be made.

To date, follow-up inspections at those facilities have not taken place. However, IEPA management stated that they intend to meet their FY 1992 commitment and conduct the follow-up inspections prior to October 1, 1992. We encourage IEPA to conduct the follow-up inspections in a timely manner, so that, in the event IEPA does not continue with the Class V program, any necessary enforcement actions can be initiated by the State prior to the transfer of authority to USEPA.

#### Public Education/Pollution Prevention

During FY 1991, IEPA developed "Troubled Waters", an educational video on the dangers of service station bay wells (5X28s). We are extremely pleased with the video. It explains very complex issues in a manner the public can understand, using interviews with technical experts and the regulated community, high quality graphics, and location shots of actual Class V facilities. The video has already been shown at several USEPA functions and has been very well received.

It is our understanding that IEPA intends to make a few minor revisions to the video prior to distribution. However, to date no timeframe has been set for completion of these activities. Furthermore, IEPA has indicated that no additional copies of the video will be distributed until the revisions are complete. The video is an excellent resource for educating the public, and we encourage IEPA to complete the revisions and continue distribution efforts as quickly as possible.

#### McHenry County Source ID Project

Phase I of the McHenry County Pollution Prevention project, a drive-by survey of stormwater drainage wells was completed in October 1991. The McHenry County Defenders (Defenders) are currently in the process of recruiting volunteers for phase II, a door to door survey of area businesses. However, through their

recruiting efforts, a number of previously unidentified concerns were identified.

Apparently, many of the volunteers expressed concern that they appeared to be acting in a regulatory capacity, rather than in an outreach capacity. While they felt comfortable distributing outreach information and collecting general information, most felt that they were in no position to judge the potential risks posed by specific facilities.

To alleviate these concerns, the Defenders proposed the following changes to their workplan:

- volunteers distribute outreach information to owners/operators (o/o), and collect very general information on each facility visited, i.e. confirm names and addresses of o/o, confirm sanitary disposal method (municipal v on-site), confirm nature of business,
- based on general information collected, Defenders refer high priority industrial and service station sites to McHenry County Health Department for detailed inspections,
- County attempts to gain voluntary closure of all high priority wells, or closure through use of local ordinances, and
- o/o who refuse to close high priority wells will be referred to the applicable State or Federal program.

In order to fund the additional inspections, the Defenders propose to pass through funds from their project grant to the County. They have also discussed the possibility of securing additional funds from USEPA to supplement the inspection and follow-up efforts.

The Region supports both the Defenders, and the County's, efforts on this project. Historically, ground water protection has been viewed as a local initiative, and hopefully, this project will serve as a model for other multi-governmental efforts.

During previous reviews, IEPA committed to participating in the ground water steering committee and the pollution prevention seminar being sponsored by the Defenders. We strongly support IEPA's continued involvement with these activities. In addition, the Region will continue to work with the Defenders on the successful completion of this project, and also on the possibility of securing additional funding for follow-up activities.

**Recommendations and Conclusions**

1. We remain concerned that adequate resources are not being directed toward Class V activities. Since the FY 1991 EOY evaluation, apparently the only Class V activity conducted by IEPA has been the response to inquiries regarding current requirements. While this is a worthwhile activity, it falls far short of comprising an adequate Class V program.
2. During FY 1991, IEPA completed a Class V video, inspections of 104 high priority facilities, and also initiated discussions with other programs regarding Class V overlap. We are disappointed that no follow-up to these activities appears to be taking place.
3. The Pollution Prevention/Source ID project funded by USEPA and sponsored by the McHenry County Defenders is progressing well. We encourage IEPA to become involved with the upcoming pollution prevention seminar and provide technical assistance if requested.



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

DATE: November 6, 1992

TO: Laura Flynn, USEPA

FROM: Glenn Savage, IEPA/LPC/FOS

SUBJECT: UIC Report Fiscal Year 19921

RECEIVED

NOV 10 1992

The following is a summary of activities done by Illinois inspectors for Class I and Class V UIC wells:

## CLASS I -

Illinois committed to do 6 inspections during fiscal year '92. 6 of these inspections were completed. A revised fourth quarter report was submitted.

Class I compliance reviews - In the Champaign region, each of the 5 Class I well files were reviewed at the time of the annual inspections. In addition, the monthly operating reports were reviewed quarterly. This results in a total of 25 compliance reviews. If new violations were found, a CIL was sent to the facility. These violations were included in the Part II: Compliance Evaluation, Part V-Summary of Violations Part B6. The compliance review resulted in two CIL's being sent.

CIL's and PECL's sent in 1992- No PECL's were sent in FY'92. A total of 2 CIL's were sent by Field Operations in FY'92. (See Attached)

## CLASS V -

USEPA requested follow-up inspections be conducted at 16 sites of possible Class V wells. In many cases, a follow-up inspection was not conducted because what was needed to be determined was where the drains on site discharged. Records, blueprints or statements from the municipal waste water treatment plant were requested in a letter to the facility.

Of the 16 sites, 5 inspections were completed and 11 letters sent to the facility. The results are as follows:

Adam's Brother Radiator - Inspected by Gino Bruni, site has two Class V wells that have been permanently abandoned. Sumps collect floor washings and the liquid waste is pumped to wastewater treatment system. Solids are shipped off site.

Bill's Standard - Inspected by Gino Bruni, waste is collected into underground tanks and picked up by a special waste hauler.

Freund International - Inspected by Gino Bruni, facility does have two Class V wells. Settling tanks settle out solids then water discharges to septic field. Inspector will sample.

John Bearce Ford - Letter sent by John Tripses, facility replied that surface runoff is running to an abandoned septic tank which vents through a pipe on to the surface. Inspector will try to sample discharge.

Ron's Standard - Letter sent by Jeff Turner, no reply was received. FOS will continue to try and contact facility.

Speed Lube - Letter sent by Jeff Turner, facility owner brought plans into Regional Office showing floor drains connected to Decatur sewer system.

Dixie Trucker - Letter sent by Jeff Turner, manager indicated drain discharged onto field tile. Sampling will occur by Land Pollution of Water Pollution.

Koenig's Amoco - Letter sent by Jeff Turner, original owner stated two of the three drains were connected to sewer system and most likely third drain is also.

Larry's Amoco - Jeff Turner sent letter, no reply from facility. Jeff drove by site and saw the area had been totally excavated(possible LUST site).

Hultz Shell - Inspected by Allyn Colantino, station is connected to Quincy sewer system.

First Bank Trust - Inspected by Allyn Colantino, Realtor stated drains flowed onto the ground. Site is empty so no samples can be taken.

Bluff Food Mart - Letter sent by Ken Mensing, manager replied that drains were hooked up to Collinsville sewers.

Dennis Auto Sales - Letter sent by Ken Mensing, facility stated they do have a Class V well with a waste management policy and included a list of waste haulers

Jack Schmitt Ford - Letter sent by Ken Mensing, facility drains were hooked up to city sewers.

Moto Mart - Letter sent by Ken Mensing, facility replied that all drains are connected to sewer system.

LB Ford - Letter sent by Gary Steele, drains discharge into settling tank and septic system or sand filter. Inspector will sample.